

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

FLORENCE DIVISION

Ray Harrison, on behalf of himself and those similarly situated,)	Civil Action No. 4:11-cv-01304-TLW
)	
)	
Plaintiff,)	<u>CONSENT MOTION FOR</u>
)	<u>EXTENSION OF TIME TO RESPOND</u>
vs.)	<u>TO COMPLAINT</u>
)	
Anderson Brothers Bank,)	
)	
Defendant.)	
_____)	

Pursuant to Local Civil Rule 6.01, DSC, and with consent of Plaintiff, Defendant Anderson Brothers Bank hereby moves for an Order extending its time to answer, move pursuant to Rule 12 of the Federal Rules of Civil Procedure, or otherwise respond to the Complaint filed in the above-captioned case. This Motion is made on the following grounds:

1. The response to the Complaint is currently due on July 14, 2011.
2. The deadline to answer, move pursuant to Rule 12, or otherwise plead in response to the Complaint was previously extended once with Plaintiff's consent.
3. Defendant requests that the deadline be extended by 20 days to August 3, 2011.
4. At this time, there are no other deadlines scheduled in this matter, and an extension of time to respond to the Complaint will not affect other deadlines.
5. The reason for this extension is that Plaintiff and Defendant have been investigating the facts and a potential early resolution of this matter and need time to continue that investigation.

6. Defendant requests that the Court enter an Order extending the deadline for Defendant's response to the Complaint to August 3, 2011.

7. Undersigned counsel consulted with opposing counsel, and counsel for Plaintiff consent to the request.

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